



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
GREAT LAKES NATIONAL PROGRAM OFFICE
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

JUN 04 2012

Michael McClellan
Lansing District Supervisor
Michigan Department of Environmental Quality
Lansing District Office
Air Quality Division
Constitution Hall
P.O. Box 30260
Lansing, Michigan 48909

Dear Mr. McClellan:

The U.S. Environmental Protection Agency has reviewed the draft Renewable Operating Permit, permit number MI-ROP-N3570-2012, for Genesee Power Station located in Flint, Michigan. To ensure that the source meets Federal Clean Air Act requirements, that the permit will provide necessary information so that the basis of the permit decision is transparent and readily accessible to the public, and that the permit record provides adequate support for the decision, EPA has the following comment:

Condition V.1 on page 9 of PTI 265-06C, last revised September 14, 2011, requires testing every 5 years to verify Total Gaseous Non-Methane Organics (TGNMO) and Particulate Matter (PM) emission rates. The testing requirement in PTI 265-06C allows for the testing to be coordinated with the issuance of the renewal permit. Emissions Unit (EU) Boiler condition V.1, located on page 14 of the draft renewal permit, also requires verification of both TGNMO and PM emission rates via testing. However, the draft permit only requires testing prior to the expiration of the draft permit and does not define a specific testing interval for TGNMO and PM. Please ensure that EU-Boiler condition V.1 of the draft permit fully incorporates the requirements of PTI 265-06C by also requiring testing every 5 years.

We appreciate the opportunity to provide comments on this draft permit. If you have any questions, please feel free to contact me or have your staff contact Michael Langman, of my staff, at (312) 886-6867.

Sincerely,

Genevieve Damico
Chief
Air Permits Section